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January 15, 2016

Pharmaceutical Working Group
c/o Angelo J. Bellomo, REHS, QEP,
Deputy Director of Health Protection
5050 Commerce Drive
Baldwin Park, CA 91706

Sent via electronic mail to: EPR@lacounty.gov

Re: Comment letter – L.A. County Pharmaceutical and Sharps Collection and Disposal Stewardship Ordinance (Draft dated 01/05/2016)

Dear Deputy Director Bellomo,

On behalf of Heal the Bay, we are pleased to submit the following letter in support of the Los Angeles County Final Draft Pharmaceuticals and Sharps Collection and Disposal Stewardship Ordinance (Ordinance). Heal the Bay is an environmental organization with over 15,000 members dedicated to making the coastal waters and watersheds of greater Los Angeles safe, healthy, and clean. Given this focus, we are fully supportive of the goal to create an ordinance which would ensure the safe and environmentally responsible disposal of pharmaceuticals and sharps, and we urge the County Supervisors to adopt the Ordinance.

The regular occurrence of used sharps on our beaches, which was highlighted during the recent unfortunate release of Materials of Sewage Origin from the Hyperion Water Treatment Plant in September, reinforces the need for proper post-use sharp collection and disposal in our community. Moreover, any legislation that has the potential to limit pharmaceuticals from entering our precious water resources where they are later known to have deleterious effects on aquatic life will be tremendously beneficial to our environment.¹

Heal the Bay appreciates the County's efforts to engage stakeholders and incorporate their input during the development of the Ordinance. Considering the Ordinance's language, great efforts were obviously made by the staff to see what has worked well in implementing sharps and pharmaceutical take-back programs in other counties. We applaud that the Ordinance takes care to consider secure handling of returned materials and looks to dispose of these in an environmentally sound way. This effectively works to benefit both the safety of sanitation workers as well as the overall environmental health of the County. The attention to detail provided by County staff is to be commended and will serve the community and environment well if the Ordinance is adopted.

¹ State of Washington Department of Ecology, "Pharmaceutical Waste;" available at <http://www.ecy.wa.gov/programs/hwtr/pharmaceuticals/pages/pie.html>



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After close review we believe there are a few key aspects of the draft Ordinance where language can assure more effective implementation. First we recommend that the County ensure that the Collection Sites are convenient for all Los Angeles County residents and that Stewardship plans are as detailed as possible. Also, in the interest of bolstering the safety of our County's sanitation workers, a uniform color for all sharps would help to provide a visual warning to those involved in disposal. Finally, and most important for our group's desire to keep our County's water safe, healthy, and clean, would be to *assure* that stewards *do not* promote in-house, private trashing of unwanted sharps and medications in their required educational programs. Trashing of sharps can risk the health and safety of our sanitation workers, as well as anyone else who comes into contact with the trash. Even if they end up in lined landfills, trashing medications can still impact our waterways if landfill leachate ends up in our wastewater stream.

Again, thanks for the opportunity to provide feedback on this Final Draft Ordinance. We are proud to have the County of Los Angeles trailblazing action on this issue. If you have any questions, please feel free to contact us at (310) 451-1500.

Sincerely,

Steven Johnson
Water Resources Policy Analyst
Heal the Bay

Rita Kampalath, Ph.D., P.E.
Science and Policy Director
Heal the Bay